UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST, *et al.*, individually and on behalf of a class of all others similarly situated,

Plaintiffs,

v.

CITY OF BUFFALO, N.Y., et al.,

Defendants.

No. 1:18-cv-00719-CCR

STIPULATED MOTION TO EXTEND MOTION TO COMPEL DEADLINE

The Parties respectfully move to amend the scheduling order to extend the motion to compel deadline from November 12, 2024 to December 18, 2024.

- 1. Under the present schedule, the deadline for any motion to compel is November 12, 2024.
- 2. Deposition and document productions completed in September 2024 resulted in the identification of additional materials. The parties require additional time to meet and confer about these materials and to complete production of any remaining relevant materials.
- 3. The Parties continue to work together to identify and produce any remaining productions as efficiently and expeditiously as possible and continue to believe that extension of the motion to compel deadline to December 18, 2024, may enable them to resolve any remaining issues without court intervention.

WHEREFORE, the Parties respectfully request that the Court modify the schedule as proposed.

Dated: November 11, 2024

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on November 11, 2024, the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Western District's Local Rules, and/or the Western District's Case Filing Rules & Instructions upon all counsel registered through the ECF System.

/s/ Claudia Wilner